

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SERGEY ALEJNIKOV,

Plaintiff,

v.

THE GOLDMAN SACHS GROUP, INC.,

Defendant

THE GOLDMAN SACHS GROUP, INC. and
GOLDMAN, SACHS & CO.

Counterclaim Plaintiffs

v.

SERGEY ALEJNIKOV,

Counterclaim Defendant.

No. 12-cv-5994-KM-MAH

NOTICE OF MOTION TO SEAL

To: Kevin H. Marino
MARINO, TORTORELLA & BOYLE, P.C.
437 Southern Boulevard
Chatham, NJ 07928
Counsel for Plaintiff Sergey Aleynikov

PLEASE TAKE NOTICE that on December 16, 2013 or as soon thereafter as counsel may be heard, Defendant/Counterclaim Plaintiff The Goldman Sachs Group, Inc. and Counterclaim Plaintiff Goldman, Sachs & Co. (collectively "Goldman Sachs"), shall move before Honorable Michael A. Hammer at the United States District Court for the District of New Jersey, Martin Luther King Building and United States Courthouse, 50 Walnut Street, Newark, NJ 07101, for an order pursuant to Local Civil Rules 5.3(c) and 7.1 to seal certain information in court filings in this matter.

PLEASE TAKE FURTHER NOTICE that Goldman Sachs relies upon the Declaration of A. Ross Pearlson, Esq. and accompanying exhibits, Goldman Sachs' memorandum of law filed in support of its September 30, 2013 motion to seal in this matter (ECF No. 167-1), the Stipulation and Protective Order entered on February 25, 2013 (ECF No. 81), as well as all other pleadings and memoranda filed in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Dated: November 22, 2013

/s/ A. Ross Pearlson
A. Ross Pearlson
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*Counsel for The Goldman Sachs Group, Inc.
and Goldman, Sachs & Co.*

CERTIFICATION OF SERVICE

I certify that the foregoing Notice of Motion to Seal, Declaration of A. Ross Pearlson, Esq. in Support of Motion to Seal, Memorandum of Law, and proposed form of order were served this 22nd day of November, 2013, upon the following counsel via the Electronic Case Filing System:

Kevin H. Marino
MARINO, TORTORELLA & BOYLE, P.C.
437 Southern Boulevard
Chatham, NJ 07928
Counsel for Plaintiff Sergey Aleynikov

/s/ A. Ross Pearlson
A. Ross Pearlson